

EXHIBIT F

Litigation Plan for Lauri Valjakka

Lauri Valjakka (Lauri) owns US patent No. 8,495,167, and believes that its claims are being infringed in the US by multiple entities including Akamai Technologies. Lauri has not yet enforced the 167 patent. Lauri is interested in enforcing or otherwise monetizing the 167 patent against potential infringers in the US starting with Akamai. AiPi is interested in monetizing the 167 patent, such as via a licensing and litigation campaign based on the terms specified herein.

AiPi will draft a Complaint with all supporting documents against Akamai. AiPi will engage an acceptable US law firm (and in particular Erick Robinson at Porter Hedges) to have the Complaint filed in WD Texas and served on Akamai to initiate the litigation. After service of the Complaint, AiPi will perform requisite substantive analyses for supporting the litigation, manage the US law firm, and coordinate with other counsel and experts. AiPi will follow the same process for other defendants, including but not limited to Microsoft, Sony, and Netflix, once infringement analyses are completed and verified.

For each of these cases, AiPi shall pursue one of two alternative financing strategies, which will cover not only the actual litigation but also any IPR filed in an attempt to invalidate the patent, and which will be selected during the course of each litigation. In particular, AiPi shall either directly finance the litigations or alternatively obtain outside investors to provide the financing.

However, regardless of the financing strategy, the business arrangement between AiPi and Lauri will be the same. In particular, AiPi shall, upon settlement or judgment, adopt the previously discussed litigation funding model where AiPi will receive the invested amount (i.e., actual amounts spent on each litigation) plus the greater of [REDACTED] of the remainder or a multiple of the actual spend depending on the duration of the case, i.e., [REDACTED] the actual spend if settlement or judgment occurs less than 1 year after service of the Complaint, or [REDACTED] the actual spend if settlement or judgment occurs 1 year or longer after service of the Complaint.

Key members of AiPi's team are discussed below.

Our Team



Jonathan Merrill, MD

This effort will be led by Jonathan Merrill, a serial entrepreneur, who has founded and managed a number of medical and educational technology companies that resulted in both public and private acquisitions. Jon has focused his career on the use of technologies that include simulation, machine learning and cloud-based solutions to catalyze business and IP growth. Jon is also an expert in the use of intellectual property and data analytics to drive value by augmenting R&D efforts, defending technology positioning, and identifying present and future competitors, customers, M&A candidates, etc. Successful exits include the sale of HT Medical (medical virtual reality education company) to Immersion Corp (NASDAQ) for \$42M; C3P Pharmacy Education (pharmacy education platform) to HealthAnswers, Inc.; and Astute Tech (e-learning platform) to Echo360.

Jon is a Founder of AiPi, LLC, and provides intellectual property and business strategy consultations. He has provided business and IP landscape analysis and patent services for a wide range of technology companies, and works with various investment bankers, venture capitalists, etc., such as in the context of M&A.



Eric Morehouse, JD

Eric Morehouse will support AiPi's efforts. Eric is a patent attorney having nearly three decades of experience with numerous technologies, including aerospace, image processing, medical devices, pharmaceuticals, computer software, electrical switches and connectors, and telecommunications. He has lectured and supervised training seminars for technology companies and law firms on various aspects of patent practice, including patent specification and claim drafting, examination and post-examination strategies, claim construction, validity and infringement analyses, patent infringement litigation, and IP strategy creation.

After spending a career in private practice as a patent attorney, Eric now specializes in consulting early, mid-stage, and mature technology companies to enhance their valuations and monetize IP portfolios. In addition to AiPi, Eric is a Founder of PiVerse, Inc., which implements IP support services including searching, IP analytics, valuation support, etc., and Dulany Street Capital, which finances patent infringement litigations. Eric combines IP strategy and implementation services to generate revenue from IP and enhance corporate valuations.



Hon. Tidal (Ty) McCoy

Ty is venture capitalist and in particular **founder and Chairman of IronGate Capital Advisors – a leading Washington, DC area venture capital fund**, former business executive, and Presidential Appointee/Senate Confirmed. He led the US Air Force, as Acting Secretary/UnderSecretary/SrAsstSecy from 81-88, in reestablishing US military/air/space/cyber power during the Cold War, fielding advanced technologies such as Stealth aircraft and reshaping USAF/NATO warfighting doctrine to ensure deterrence through the ability to defeat RedAir and strike deep (AirLand Battle doctrine leader), while also ensuring nuclear deterrence with advanced technology insertion. In this capacity and in earlier capacity, as Deputy Assistant to the Secretary of Defense (Immediate Office), he reported to 7 SecDefs and three Presidents, on various matters. He holds many of the highest DOD civilian and military awards (also, combat command and special operations assignments).

After retirement from Federal Service, he founded/sold a national bank, discovered/transacted on the sale of Network Solutions for a 1785X return in 5 years, managed the dual use transfer of solid rocket motor technology into the modern auto airbag at Pres Thiokol Technologies to create a revenue stream of several tens of billions of dollars, and advanced other technology companies to strong success.

Ty focuses on understanding threats, needs, problems, and opportunities—or creating them, and then shaping the real question and finding the best solution using capital, talent, partnerships, public relations, congressional support, public acceptance/demand, education, legal/financial/technology knowledge, and strategic planning/teaming.



Edward Rossotti

AiPi's efforts will also be supported by Edward Rossotti. Edward is a finance executive with over twenty years of capital raising structured senior lending and financial planning and analysis experience. Edward received a term federal appointment in 2010 to serve as a Senior Investment Officer with the United States Department of Energy Loan Programs Office, where he led investment teams evaluating and structuring loans to finance carbon reducing projects in the automobile industry. Previously, he was a Director with Susquehanna International Group (SIG), where he raised capital for public and private companies and advised on mergers and acquisitions. Earlier in his career, Edward managed Financial Planning and Analysis for a business process outsourcing division of MCI Communications, Inc.

Edward graduated from The University of Pennsylvania with a B.A. in Economics in 1994. While there, he was on the Dean's List and the Varsity Lightweight Crew Team. In 2000, Edward received an M.B.A with honors from Georgetown University's McDonough School of Business, where he concentrated in Finance.



Stoyan Radkov, PhD

After a successful career as a senior scientist at Imperial College London and University College London, researching viral oncology, Stoyan trained as a patent attorney at the top tier IP firm D. Young & Co, before moving in-house to Pfizer, in the UK, and then Novartis and Syngenta, in Switzerland. Stoyan has a wealth of experience in undertaking patent due diligence projects, FTOs, validity & infringement opinions, IP landscape analyses, patent application drafting and filing, global patent prosecution, life-cycle management and strategic advice. Stoyan advises companies on the value of their existing IP portfolio and how to maximize its full potential.

One of Stoyan's particular strengths is his ability to rapidly grasp technically & scientifically demanding concepts. Stoyan is also able to explain complex technical and scientific concepts clearly and succinctly to others – especially to members of the EPO. His success at the EPO has been recognized in the Legal 500: *"New partner Stoyan Radkov specializes in high-value oppositions and appeals at the EPO, representing clients from the biotech and life sciences industries."* Stoyan's education and training include the following:

- First Class – BSc Honours Degree – Microbiology, University of Reading
- PhD – Viral Oncology – Ludwig Institute for Cancer Research, St Mary's Hospital, Imperial College London
- Post-doctoral fellow – Imperial College London
- Senior CRC funded post-doctoral fellow – University College London
- Private practice IP attorney – D. Young & Co (UK), UDL (Partner – UK) and HGF (Director, UK and Basel, CH)
- In-house IP attorney – Pfizer (Sandwich, UK), Novartis (Basel, CH) and Syngenta (Basel, CH)



Ken Haase, PhD

Ken Haase, PhD, will lead AiPi's technical team. Ken is an expert in computer software, machine learning, artificial intelligence, Internet of Things and computer/electronic hardware. Ken graduated from MIT with a B.S. as well as a PhD, in Computer Science and Philosophy (completing his PhD at MIT's Artificial Intelligence Laboratory, studying under the AI luminary, Marvin Minsky), and is an experienced inventor who has been credited with pioneering work at the MIT Media lab.

Ken's on-going research leverages the increasing value of rich semantic metadata. He has developed crucial technologies for generating, managing, and applying such metadata for search, routing, and automation, and he has developed R&D strategies for machine learning, visualization, bioinformatics, geospatial technologies, electronics and other technologies. Ken worked on a system for Bank of Boston to predict cost of various financial instruments, and this work was profiled by Harvard Business School. Ken then built a platform for search and discovery with large databases including: a layered data cache architecture, a distributed RPC (Remote Procedure Call) architecture, a simple but versatile serialization format, and a lightweight object reference protocol.

Ken developed this platform by incorporating architectural advancements across the software and network stack, including new algorithms, integration of emerging protocols and standards, and optimized code for CPU and GPU architectural advancements. These developments were driven by both the character of the data being searched, and the need for flexibility in both how things are described and in how they may be stored (different database models and servers) or accessed (web and database protocols). This work has been published as an open-source platform called Kno.

As a professor at MIT's Media Laboratory, Ken focused on these issues with "people in the loop" and UX/UI with machine learning. Ken and his students designed and created systems that used structured knowledge to help people search, understand, and use online information and services. Ken worked on issues involving natural language and textual analysis to extract meaning from language, and developed technical solutions supporting very large heterogeneous databases that could efficiently represent, at scale, fine-grained metadata from a variety of sources and processes.



George Aposporos

AiPi's efforts will also be supported by George Aposporos. George is a tech executive, founder, and consultant for growth companies and non-profits, specializing in creating transformative initiatives. He was founding VP of Business Development at Amazon.com, and helped turn Amazon from an upstart US bookseller into an international e-commerce destination. George grew Amazon's Business Development group and oversaw strategic partnerships, including with AOL, Yahoo, and Netscape. George was also instrumental in growing Amazon's customer base from 300,000 to 11 million customers, and revenues from \$15 million to c. \$1.5 billion in 2 years.

George has worked directly with both Jeff Bezos and Priceline founder Jay Walker, and is a named inventor on several US patents directed to streaming media system technologies. George focuses on creating and growing foundational new business lines through innovative strategies, business development, marketing, innovation, growth strategies, brand management, and partnerships.



Logistics and Signatures

Lauri shall own all intellectual property covering innovations that AiPi develops in accordance with its services under this Proposal.

AiPi, LLC

Lauri Valjakka

Signature: _____

Signature: _____

Eric Morehouse

Name: Lauri Valjakka

Founder

Title: CEO & Founder

Date: _____

Date: 19.8.2021